



Audubon

Upper Mississippi River Campaign

2968

March 3, 2006

Don Hultman, Refuge Manager
Upper Mississippi River National Wildlife and Fish Refuge
51 East 4th Street, Room 101
Winona, Minnesota 55987

Mr. Hultman:

We are proud to continue to celebrate the beauty and diversity of the Upper Mississippi River National Wildlife and Fish Refuge and the Driftless Area Refuge with you and your agency. We believe this is one of the most significant refuges on the planet and certainly a critical piece of wildlife habitat in the middle of North America – a national treasure worthy of our attention. We celebrate the foresight of those who helped establish the refuge and the subsequent wise management of the diversity of habitats within the Upper Mississippi River National Wildlife Refuge from Wabasha to Savanna.

As we have stated in previous comments on the new Refuge Plan, we feel that in order to maintain the uniqueness of this complex river ecosystem a strong effort for habitat restoration will be required. It will also require a similar effort on other public lands and private lands within the watershed within this great Mississippi River flyway that is so critical to more than 300 bird species. We hope that the Upper Mississippi National Wildlife and Fish Refuge will receive the support needed from the existing Upper Mississippi River Environmental Management Program (EMP) and the Navigation and Environmental Sustainability Program (NESP) ecosystem restoration programs. We also hope that the recently published Pool Plans will be adopted by the multi-agency River Resources Forum.

Perhaps our only disappointment in Alternative E is the reduction (from Alternative D) in the number of Closed Areas, and the number of No Wake or Electric Motors Only. Even though these measures have not met with complete public support in some communities along the river, we feel these measures increase the value of the refuge for birds and for human enjoyment.

One specific item in Pool 9 is the Kain's Siding area - if indeed a trail is to be constructed in that area, we ask that construction of the trail be down-sized to a rather small area of impact. Most importantly, we hope that the work needed in the construction of that trail will be accomplished between late June and early February. The Kain's area is the only location within Pool 9 where we have documented multiple nesting sites for Red-shouldered Hawks and we would hate to see Red-shoulders abandon any of those nesting sites due to construction activity that took place during the nesting season. (Red-shoulders are usually on territory in late February and continue the nesting cycle until mid June, and they are often sensitive to continued human disturbance. Please feel free to contact us if you have any questions regarding this issue).

As part of the efforts to reduce wave erosion and noise pollution we believe the U.S. Fish & Wildlife Service should consider a 35 mph speed limit on all boats traveling through the refuge.

We strongly support acquisition from willing sellers of approximately 1000 acres of land per year as identified in the 1987 Master Plan. This seems like a prime opportunity for the USF&WS to work closely with the Blufflands Alliance. The Blufflands Alliance has an excellent record of leveraging funds from various sources and to giving high priority to acquiring in fee title or by easement.

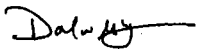
We agree fully with your statement that "The quality of the water on the Refuge is one of the most important factors influencing fish, wildlife, and aquatic plant populations and health, which in turn influence the opportunity for public use and enjoyment." It is critical that more attention be paid to reducing sediment and nutrient loadings from tributary streams flowing into the Refuge. The filling in of Refuge backwaters is a particularly well-documented problem that is compounded by the construction of the locks and dams in the 1930s, resulting in the conversion of the free-flowing river into a series of pools that trap sediments in the slow-moving backwaters.

We support the continuation of water level management in as many pools as possible. Water level management has proven to be an effective means of consolidating sediments and increasing the growth of emergent vegetation. The key guiding principles for habitat management projects should be: "Management practices will restore or mimic natural ecosystem processes or functions to promote a diversity of habitat and minimize operations and maintenance costs."

Monitoring of the status and trends of species on the refuge is critical to management. Of special note, in the discussion of Threatened and Endangered Species Management, it is noted that currently, the only species actively monitored on the Refuge are Bald Eagles. There are several other species of birds such as Red-shouldered Hawks, Prothonotary Warblers, Cerulean Warblers, Pileated Woodpeckers, and several other Neotropical Migrant birds that we feel should be monitored more closely. **Audubon's Mississippi River Campaign** hopes to build on our ability to assist you in providing monitoring of some of these species in the future.

We congratulate you and your staff for a job well done. We look forward to the continuation of this Refuge Plan and to working with you on the river.

Sincerely,



Dan McGuinness
Audubon Mississippi River Campaign
2357 Ventura Dr, Suite 106
Woodbury, MN 55125
Ph 651-739-9332
e-mail: dmcguinness@audubon.org



Jon Stravers
Audubon Mississippi River Campaign
P.O. Box 309
McGregor, IA 52157
Ph - 563-586-2621
e-mail: hawk@acegroup.cc